



## REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-8 are pending, of which claims 7 and 8 have been amended.

Applicant appreciates the Examiner's time for our interview on April 18, 2001, and wishes to thank the Examiner for her efforts to resolve the pending issues that preclude allowance of the subject application. Specifically, the Examiner has agreed to reconsider the Robertson reference as a basis for rejecting the pending claims.

### Claim Objection

Claim 8 is objected to as being of improper dependent form. Specifically, the Office states that "claims 3 and 8 both claim a control identifier having an active and an inactive state." (*Office Action* p.2). Claim 8 has been amended to clarify "an identifier for an individual control", while claim 3 recites "a control grouping identifier".

Accordingly, Applicant respectfully requests that the objection to claim 8 be withdrawn.

### 35 U.S.C. §103

Claims 1-8 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 5,596,347 to Robertson et al. (hereinafter, "Robertson"). Applicant respectfully traverses the rejection.

Robertson describes a system that determines an intended cursor location on a computer display and repositions the cursor at the intended location.

1 Robertson utilizes a control list storage area to store a list of possible cursor  
2 locations for a screen display (Item 28 of Fig. 1; col. 5, lines 8-10). The cursor  
3 locations of a screen display are loaded into the control list when the screen  
4 display is altered (Step 56 of Fig. 2A; col. 6 lines 54-56). The cursor locations are  
5 stored *individually* in the control list so that they may be sequentially analyzed to  
6 select a location at which the cursor will be positioned (Step 58-64 of Fig 2A; col.  
7 6, lines 60-62).

8 Robertson is essentially described in the “Background” section of  
9 Applicant’s Specification as the very prior art that Applicant sought to overcome.  
10 Specifically, a programmer has to *individually* activate or deactivate a given  
11 control in a conventional system which is cumbersome (*Specification* p.3, lines  
12 1-4).

13 The present Application describes a data structure that includes a provision  
14 for aggregating a group of controls, referred to as a control group, and for defining  
15 the control group as active or inactive (*Specification* p.10, lines 16-22). A control  
16 group identifier designates which control group a particular control belongs to  
17 (*Specification* p.16, lines 7-9) when each particular control is identified in the data  
18 structure. This provides a convenient method to activate or deactivate a group of  
19 the controls registered in the data structure (*Specification* p.19, lines 6-16).

20  
21 **Claim 1** recites a method of “identifying a control group, the control group  
22 being comprised of at least two controls associated in a data structure” and  
23 “representing the control group with a single status indicator in the data structure”.  
24 Robertson does not represent a *control group* comprised of at least two controls  
25 with a *single* status indicator in a data structure.

1 Claim 1 also recites “directing the activation of the controls of the control  
2 group by storing an active value in the single status indicator.” Robertson also  
3 does not direct the activation of controls of a *control group*. Furthermore, the  
4 Office recognizes that Robertson does not disclose either representing the control  
5 group with a single status indicator or directing the activation of the controls of the  
6 control group by storing an active value (*Office Action* p.3). The Office has cited  
7 no other references to overcome the deficiencies of Robertson.

8 In addressing the elements of claim 1, the Office contends that claim 1 is  
9 obvious in light of Robertson because he teaches associating a group of controls  
10 where only one control can be activated at a time, and stores a flag bit indicating  
11 the default control selection, which implies the use of data bits corresponding to  
12 controls and representing activation or deactivation of the selected control (*Office*  
13 *Action* p.3). Applicant disagrees with the Office’s contention that claim 1 is  
14 obvious in light of Robertson for the following reasons:

15 The Office states that Robertson teaches only one control can be activated  
16 at a time within an operative window (*Office Action* p.3). However, this is not  
17 “directing the activation of the controls of the *control group*”, as recited in  
18 claim 1. Robertson activates only a *single* control based on an analysis of each  
19 control location in a control list (col. 7, lines 20-30). Robertson merely loads a  
20 control list (step 56 in Fig. 2a) with “a list of possible *cursor locations* for the new  
21 screen display” (col. 5, lines 8-10). The control list is a list of cursor locations, not  
22 controls. There is nothing about this control list that suggests identifying any  
23 particular grouping of controls, as described in claim 1.

24 The Office also states that Robertson teaches storing a flag bit indicating a  
25 default control selection (*Office Action* p.3). However, this is not “representing

1 the *control group* with a *single* status indicator in the data structure”, as recited in  
2 claim 1. The only indicator described in Robertson is a default selection flag data  
3 bit that indicates which *one* of the individually stored cursor locations in the  
4 control list is the default selection (col. 5, lines 23-28). As described in claim 1,  
5 the “single status indicator” represents the *control group* in the data structure and  
6 is a store for an active value to direct the activation of all of the controls of the  
7 control group.

8 The Office concludes that Robertson’s teachings “implies the use of data  
9 bits corresponding to controls and representing activation or deactivation of the  
10 selected control” (*Office Action* p.3). Although Robertson indicates a default  
11 cursor location, this does not substantiate the Office’s conclusion that claim 1 is  
12 obvious in light of Robertson. There is nothing about Robertson to suggest using  
13 a data bit to correspond to a *control group* in a data structure, or that the data bit  
14 directs the activation of the *controls* (i.e., more than one) of the control group.

15 Furthermore, the Office has cited no other references to remedy these  
16 deficiencies of Robertson. Specifically, Robertson does not disclose either  
17 representing the control group with a single status indicator or directing the  
18 activation of the controls of the control group by storing an active value, as the  
19 Office has recognized. Accordingly, claim 1 is allowable over Robertson and the  
20 Office’s suggestions of obviousness for these many reasons. Applicant  
21 respectfully requests that the §103 rejection of claim 1 be withdrawn.

22 **Claim 2** is allowable by virtue of its dependency upon claim 1.

23 **Claim 3** defines an apparatus for activating and deactivating a control  
24 grouping having “a control grouping identifier contained within the memory,  
25 wherein the control grouping identifier has an active state and an inactive state and

1 wherein the control grouping identifier represents the controls of the control  
2 grouping.” Robertson shows no such control grouping identifier in a memory.

3 The Office suggests that Robertson discloses a control grouping identifier  
4 (*Office Action* p.4) referring to Robertson’s control list that stores cursor locations  
5 for a screen display at col. 5, lines 8-50. Robertson describes that “one of the  
6 controls in the control list storage area will correspond to a predetermined default  
7 selection”, and “the default selection is indicated by a flag data bit” (col. 5, lines  
8 20-25). These sections of Robertson only describe that one default selection is  
9 identified. Robertson does not teach “a control grouping identifier” that  
10 “represents the controls of the control grouping”, as recited in claim 3.

11 Furthermore, the Office contends that Robertson discloses that the identifier  
12 has an active state and an inactive state and that the identifier represents the  
13 controls of the control grouping (*Office Action* p.4). This is incorrect. Robertson  
14 does not represent controls of a *control grouping* with an identifier.

15 Once again the Office suggests that it would have been obvious to use  
16 Robertson because he uses “a flag data bit to identify a default control selection,  
17 which implies the use of data bits that correspond to controls and represents  
18 activation or deactivation of a selected control” (*Office Action* p.4). There is  
19 nothing about Robertson to suggest using a data bit as a control grouping identifier  
20 to correspond to a *control group* in a data structure, or that the data bit directs the  
21 activation of the *controls* (i.e., more than one) of the control grouping, as  
22 described in claim 3.

23 The Office has cited no other references to remedy these deficiencies of  
24 Robertson. Accordingly, claim 3 is allowable over Robertson, and the §103  
25 rejection should be withdrawn.

1        **Claim 4** is allowable by virtue of its dependency upon claim 3.  
2        Additionally, claim 4 recites that “the control grouping identifier is a bit of a  
3        control word.” The Office cites Robertson’s default selection flag data bit as a  
4        control grouping identifier (*Office Action* p.5). As described above in the response  
5        to the rejection of claims 1 and 3, the default selection flag data indicates which of  
6        the *individually* stored cursor locations in the control list is the *one* default  
7        selection. The Robertson default selection flag does not identify a *control group*  
8        and, thus, is not a control grouping identifier as recited in claim 4. Accordingly,  
9        claim 4 is also allowable over Robertson for this additional reason.

10       **Claims 5-7** are allowable by virtue of their dependency upon claim 1, and  
11       for many of the reasons discussed above. Specifically, Robertson does not teach  
12       or suggest the concept of representing controls of a control group with a single  
13       status indicator, nor has the Office cited any other references to remedy the  
14       deficiencies of Robertson.

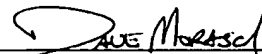
15       **Claim 8** is allowable by virtue of its dependency upon claim 3, and for  
16       many of the reasons discussed above.

### 17 18       **Conclusion**

19       Pending claims 1-8 are in condition for allowance. Applicant respectfully  
20       requests reconsideration and prompt issuance of the subject application. If any  
21       issues remain that prevent issuance of this application, the Examiner is urged to  
22       contact the undersigned attorney before issuing a subsequent Action.  
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Respectfully Submitted,

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1        **Version of amended claims with markings to show changes made**

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3        **7. (Amended)** The method of claim 1, further comprising:

4            directing the deactivation of the controls of the control group by masking

5            the active value in the single status indicator; and

6            directing the activation of [individual] the controls of the control group by

7            storing an active value in a status indicator for each control.

8

9        **8. (Amended)** The apparatus of claim 3 wherein the apparatus further

10        includes an identifier for an individual control [identifier] contained within the

11        memory, and wherein the identifier for the individual control [identifier] has an

12        active state and an inactive state.